

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Elizabeth Mercado Debtor(s)	Chapter 13 Proceeding No. 5-20-03527 RNO
Citizens Bank, N.A. Objectant(s)	
v.	
Elizabeth Mercado Respondent(s)	

OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A., a secured creditor in this case objects to the Plan and to the confirmation of the Debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on December 14, 2020, Citizens Bank, N.A. is the holder of a secured claim against the debtor's property located at 1516 Slope Road, East Stroudsburg, PA 18302 (hereinafter "the proeperty"), for the sum of \$258,824.39. On that date the arrears to be paid through the plan were \$9,486.44 A Proof of Claim was filed by Citizens Bank, N.A. on or about February 17, 2021. See Exhibit "A" attached hereto and made a part hereof.
3. Debtor's Plan contains no provision for the payment of Citizens Bank, N.A.'s pre-petition arrears claim.

4. If the Plan is confirmed the Citizens Bank, N.A. will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy
Attorney I.D. No. 77149
1310 Industrial Blvd.
1st Floor, Suite 101
Southampton, PA 18966
215-942-9690 phone
215-942-9695 fax
Attorney for Citizens Bank, N.A